

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

MATTHEW REYNOLDS,

Plaintiff,

v.

WILLERT MFG. CO., LLC,

Defendant.

CIVIL ACTION NO. 5:21-cv-01208JFL

DEFENDANT WILLERT MANUFACTURING COMPANY, LLC's
ANSWER TO PLAINTIFF'S COMPLAINT

COMES NOW Defendant Willert Manufacturing Company, LLC ("Willert") and for its Answer to Plaintiff's Complaint, states as follows:

INTRODUCTION

1. Defendant admits Plaintiff brings this action under Pennsylvania's Medical Marijuana Act ("MMA") but denies it violated the MMA. Defendant denies the remaining allegations contained in Paragraph 1.

2. Defendant admits Plaintiff seeks redress related to his termination but denies that Plaintiff's termination was related to status as user or that Defendant violated the MMA.

3. Defendant admits Plaintiff seeks damages sought but denies it violated the MMA or that Plaintiff is entitled to damages.

JURISDICTION AND VENUE

4. Defendant admits jurisdiction is proper in this Court based on 28 U.S.C. § 1332. Defendant denies it violated the law. Defendant is without sufficient knowledge to admit or deny the remaining allegations contained in Paragraph 4 and, therefore, denies same.

5. Defendant admits venue is proper in this Court because Plaintiff worked and was discharged from his employment in this judicial district. Defendant denies it violated the law. Defendant is without sufficient knowledge to admit or deny the remaining allegations contained in Paragraph 5 and, therefore, denies same.

PARTIES

6. Defendant incorporates its answers to Paragraphs 1 through 5 of Plaintiff's Complaint as if fully set forth and reinstated herein.

7. Defendant is without sufficient knowledge to admit or deny the allegations contained in Paragraph 7 and, therefore, denies same.

8. Defendant admits Plaintiff was an employee of Defendant. Defendant denies the remaining allegations contained in Paragraph 8.

9. Defendant is without sufficient knowledge to admit or deny the allegations contained in Paragraph 9 and, therefore, denies same.

10. Defendant admits that it was an employer of Plaintiff. Defendant denies the remaining allegations contained in Paragraph 10.

11. Defendant admits it is a for-profit Missouri LLC that does business in the State of Pennsylvania. Defendant is without sufficient knowledge to admit or deny the remaining allegations contained in Paragraph 11 and, therefore, denies same.

12. Defendant admits is engaged in revenue-generating activities. Defendant denies the remaining allegations contained in Paragraph 12.

13. Defendant is without sufficient knowledge to admit or deny the allegations contained in Paragraph 13 and, therefore, denies same.

FACTUAL ALLEGATIONS

14. Defendant incorporates its answers to Paragraphs 1 through 13 of Plaintiff's Complaint as if fully set forth and reinstated herein.

15. Defendant admits the allegations contained in Paragraph 15.

16. Defendant denies the allegations contained in Paragraph 16.

17. Defendant is without sufficient knowledge to admit or deny the allegations contained in Paragraph 17 and, therefore, denies same.

18. Defendant is without sufficient knowledge to admit or deny the allegations contained in Paragraph 18 and, therefore, denies same.

19. Defendant is without sufficient knowledge to admit or deny the allegations contained in Paragraph 19 and, therefore, denies same.

20. Defendant is without sufficient knowledge to admit or deny the allegations contained in Paragraph 20 and, therefore, denies same.

21. Defendant admits Plaintiff was subjected to a pre-employment drug screen at Pottstown Hospital and reported for same. Defendant is without sufficient knowledge to admit or deny the remaining allegations contained in Paragraph 21 and, therefore, denies same.

22. Defendant admits the allegations contained in Paragraph 22.

23. Defendant admits Plaintiff was terminated on or about November 5, 2020. Defendant denies the remaining allegations contained in Paragraph 23.

24. Defendant admits the allegations contained in Paragraph 24.

25. Defendant denies the allegations contained in Paragraph 25.

26. Defendant denies the allegations contained in Paragraph 26.

27. Defendant is without knowledge and information as to what Plaintiff believes. Defendant denies the remaining allegations contained in Paragraph 27.

28. Defendant is without sufficient knowledge to admit or deny the allegations contained in Paragraph 28 and, therefore, denies same.

29. Defendant is without sufficient knowledge to admit or deny the allegations contained in Paragraph 29 and, therefore, denies same.

30. Defendant is without sufficient knowledge to admit or deny the allegations contained in Paragraph 30 and, therefore, denies same.

Wrongful Termination

31. Defendant incorporates its answers to Paragraphs 1 through 30 of Plaintiff's Complaint as if fully set forth and reinstated herein.

32. Defendant denies the allegations contained in Paragraph 32.

33. Defendant denies the allegations contained in Paragraph 33.

34. Defendant denies the allegations contained in Paragraph 34.

35. Defendant denies the allegations contained in Paragraph 35.

36. Defendant denies the allegations contained in Paragraph 36.

37. Defendant admits the allegations contained in Paragraph 37.

FURTHER DEFENSES

1. Plaintiff's Complaint fails to state a claim upon which relief can be granted.

WHEREFORE, having fully answered Plaintiff's Complaint, Defendant Willert Manufacturing Company, LLC, prays for judgment against Plaintiff and in Defendant's favor, and for such other and further relief as the Court may deem just and proper.

Dated: March 19, 2021

Respectfully submitted,

WILLERT MANUFACTURING CO. LLC

By its attorney,

/s/ Daniella Gordon

Daniella Gordon (PA ID No. 201477)

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CERTIFICATE OF SERVICE

I, Daniella Gordon, hereby certify that on March 19, 2021, I caused a true and correct copy of the foregoing to be served upon all counsel of record via the Court's ECF filing system.

/s/ Daniella Gordon

Daniella Gordon